

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

OCT 20 2015

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NAEL ALI,
CHRISTINA BOWEN (a.k.a.
"Christina Sandoval"), and
MOHAMMAD MANASRA,

Defendants.

CRIMINAL NO. 15-3762 JCH

MOTION TO SEAL INDICTMENT

THE UNITED STATES OF AMERICA hereby requests that the Indictment in this case, this Motion, and any resulting Order be sealed. The United States plans to execute the arrest warrants related to this Indictment in conjunction with a series of search warrants in order to minimize the risk of destruction of evidence at those search locations. Filing the Indictment in this case, this Motion, or any resulting Order would disclose to the subjects of the underlying investigation the scope of the investigation, which might jeopardize investigative efforts.

Therefore, the Indictment, the Motion, and any resulting order should be sealed in accordance with Federal Criminal Rule of procedure 6(e)(4), which provides that a federal magistrate judge can direct an indictment be sealed "until the defendant is in custody or has been released pending trial."

Respectfully submitted,

DAMON P. MARTINEZ
United States Attorney

A handwritten signature in black ink, appearing to read 'Kristopher N. Houghton', with a stylized flourish at the end.

Kristopher N. Houghton
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